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9 UNITED STATES DISTRICT COURT
10 DISTRICT OF NEVADA

11 JAQUAN BARNES,

12 Plaintiff,

13 vs.

14 WILLIAM GETTIERR, et al.,

15 Defendant.
16

Case No. 3:18-cv-00390-MMD-CLB

**MOTION TO EXTEND DISPOSITIVE
MOTIONS DEADLINE (First Request)**

17 Defendants, Richard C. Adams, Mark Boyd, William Gittere, and Evelyn
18 Rodriguez, by and through counsel, Aaron D. Ford, Attorney General of the State of
19 Nevada, and Rost C. Olsen, Deputy Attorney General, move this Court for a 90-day
20 extension of the dispositive motions deadline.

21 **MEMORANDUM OF POINTS AND AUTHORITIES**

22 Federal Rule of Civil Procedure 6(b)(1) governs extensions of time and provides as
23 follows:

24 When an act may or must be done within a specified time, the
25 court may, for good cause, extend the time: (A) with or without
26 motion or notice if the court acts, or if a request is made, before
27 the original time or its extension expires; or (B) on motion made
after the time has expired if the party failed to act because of
excusable neglect.

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1 Here, Defendants respectfully request a 90-day extension to the dispositive motions
2 deadline contained in the scheduling order in this matter, currently set for May 6, 2020.
3 (ECF No. 21 at 3:24-26). The Court entered the scheduling order prior to staying this
4 matter for 90 days as to Defendant Adams pursuant to the American Service-Members
5 Protection Act. (ECF No. 27 at 2).

6 Defendants submit this extension will allow for the efficient adjudication of this
7 matter, and will preclude all parties from unnecessarily duplicating their efforts in
8 preparing multiple motions, oppositions, etc. Furthermore, such an extension will
9 promote judicial economy in this matter, in that the Defendants will be able to present all
10 substantive issues in this matter to the Court in one motion for summary judgment, thus
11 allowing the Court to come to a comprehensive summary judgment decision in one order.

12 Additionally, should Plaintiff seek to reopen discovery as to all Defendants, or if the
13 Court is inclined to do so *sua sponte* in light of this request, Defendants would not oppose
14 such.

15 Accordingly, for the foregoing reasons, Defendants request this Court extend the
16 dispositive motions deadline currently set in this matter for May 6, 2020 for 90 days until
17 **August 4, 2020.**

18 DATED this 5th day of May, 2020.

19 AARON D. FORD
20 Attorney General

21 By: /s/ Rost C. Olsen
22 ROST C. OLSEN, Bar No. 14410
23 Deputy Attorney General

Attorneys for Defendants

24 IT IS SO ORDERED.

25 Dated: May 6, 2020.

26 
27 _____
28 UNITED STATES MAGISTRATE JUDGE

CERTIFICATE OF SERVICE

I certify that I am an employee of the Office of the Attorney General, State of Nevada and that on this 5th day of May, 2020, I caused a copy of the foregoing, **MOTION TO EXTEND DISPOSITIVE MOTIONS DEADLINE (First Request)**, to be served, by U.S. District Court CM/ECF Electronic Filing on the following:

JaQuan Barnes, #1175886
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An employee of the
Office of the Attorney General